

# Exhibit A

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

WACKER DRIVE EXECUTIVE SUITES,  
LLC, on behalf of itself, individually, and on  
behalf of all others similarly situated,

Plaintiff,

v.

JONES LANG LASALLE AMERICAS  
(ILLINOIS), LP,

Defendant.

Case No. 1:18-cv-5492

Magistrate Judge Sunil R. Harjani

**DECLARATION OF STEPHEN V. ZSIGRAY, JR.**

I, Stephen V. Zsigray, Jr., declare as follows:

1. I am an Executive Vice President at Jones Lang LaSalle Americas (Illinois), LP (“JLL”). I am currently the Managing Director of JLL’s Midwest Property Management. I have held that position since 2006. In that capacity, I am responsible for overseeing Property Management business in the Midwest and Great Lakes Regions.

2. I submit this declaration in connection with Defendant Jones Lang LaSalle Americas (Illinois), LP’s Opposition to Plaintiff Wacker Drive Executive Suites’ Motion for Class Certification.

3. I have personal knowledge of the matters set forth below, and, if called and sworn as a witness, I could and would testify competently to the facts set forth herein.

4. JLL has managed the following 20 buildings located in the Chicago Loop (as defined in Plaintiff’s Amended Class Action Complaint) for a period of time since August 13, 2014: (1) 1 North Franklin Street; (2) 101 North Wacker Drive; (3) 111 South Wacker Drive; (4) 111 West Jackson Boulevard; (5) 123 North Wacker Drive; (6) 125 South Wacker Drive; (7) 175 West Jackson Boulevard; (8) 180 North LaSalle Street; (9) 20 North Wacker Drive; (10) 200 West

Adams Street; (11) 200 West Jackson Boulevard; (12) 224 South Michigan Avenue; (13) 231 South LaSalle Street; (14) 36 South Wabash Avenue; (15) 71 South Wacker Drive; (16) 175 North Franklin Street; (17) 201 North Clark Street; (18) 300 South Wacker Drive; (19) 330 South Wells; (20) 77 West Wacker Drive.

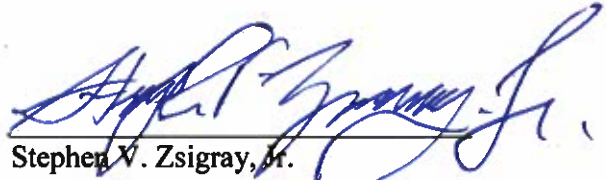
5. I served as JLL's corporate representative in JLL's Rule 30(b)(6) deposition, which was taken on December 20, 2019.

6. At the time of the 30(b)(6) deposition, JLL did not manage five of the 20 buildings listed in Paragraph 4: (1) 175 North Franklin Street; (2) 201 North Clark Street; (3) 300 South Wacker Drive; (4) 330 South Wells; and (5) 77 West Wacker Drive.

7. From November 2013 through September 2016, JLL managed the Tribune Tower, located at 435 Michigan Avenue. This building is located a half-block outside of the Chicago Loop (as defined in Plaintiff's Amended Class Action Complaint). The building owner of the Tribune Tower had a general nonunion-only rule for all labor inside the building, including any construction or moving work. As a result, when JLL managed the Tribune Tower, it implemented and enforced the building owner's nonunion-only rule.

8. During typical lease negotiations, the building owner and tenant negotiate who will retain authority and control over construction projects, which includes the authority to solicit contractor bids and select the contractor(s) for construction projects. In the majority of lease negotiations, the building owner retains authority and control over construction projects. As set forth in the management agreements between JLL and the building owners, JLL is responsible for overseeing construction projects on behalf of the building owner, which includes soliciting bids from contractors and selecting the contractor(s) for the construction projects. Thus, the majority of tenants in the buildings that JLL manages in the Chicago Loop do not have the ability to solicit or select the contractors who perform the work for construction projects in their leased space.

I declare under penalty of perjury that the foregoing is true and correct. This declaration was executed on this 11th day of June, 2020, in Chicago, Illinois.



Stephen V. Zsigray, Jr.  
Executive Vice President  
Jones Lang LaSalle Americas (Illinois), LP